

EXHIBIT M

Emails regarding Cobb County

Subject: Re: Curling v. Raffensperger - Issuance of Subpoena to Cobb County
Date: Tuesday, October 12, 2021 at 11:21:02 AM Eastern Daylight Time
From: Bryan Tyson
To: Bruce Brown, Robert McGuire
CC: Josh Belinfante, vrusso@robbinsfirm.com, Cary Ichter, Cross, David D., Adam M. Sparks, Conaway, Jenna B., Jill Connors, Carey Miller, Alexander Denton, Jonathan Crumly, Marilyn Marks
Attachments: image001.jpg, image004.jpg

Bruce,

We checked the list of files in the Sharefile versus the ones that the SOS office had and found one file that was not at the link: tabulator 01863. That file has now been uploaded and is available on the Sharefile link and brings the total to 396,532 images. Let us know if you have trouble accessing the file.

The only images the SOS received from Cobb County are the recount images.

Thanks,

Bryan

Bryan P. Tyson
Taylor English Duma LLP | [1600 Parkwood Circle, Suite 200, Atlanta, GA 30339](#)
P: [678.336.7249](#) | M: [404.219.3160](#) | btyson@taylorenghish.com
www.taylorenghish.com

California | Florida | Georgia | Illinois | Massachusetts | New York | North Carolina | Pennsylvania | Tennessee | Texas

This communication (together with all attachments) may contain privileged or confidential information, and its sender reserves and asserts all rights that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of limitation periods unless otherwise so expressly stated.

On Oct 11, 2021, at 4:34 PM, Bryan Tyson <btyson@taylorenghish.com> wrote:

Bruce,

Let me check with the Secretary's office and I'll let you know.

Thanks,

Bryan

Bryan P. Tyson

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

<image001.jpg> [Website](#) | [vCard](#) | [LinkedIn](#) | [Twitter](#)

Ask Me About Our TED Tenet of the Week: Avoid Unpleasant Surprises.

Click [here](#) to learn more about our TED Tenets.

[Georgia Legal Awards Litigation Department of the Year](#)

California | Florida | Georgia | Illinois | Michigan | North Carolina | Pennsylvania | Tennessee | Texas | Washington

This communication (together with attachments) may contain privileged or confidential information, and its sender reserves and asserts a right that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of material on periods unless otherwise expressly stated.

From: Bruce Brown <bbrown@brucepbrownlaw.com>

Sent: Monday, October 11, 2021 4:20 PM

To: Bryan Tyson <btyson@taylorenghish.com>; Robert McGuire <ram@lawram.com>

Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Cary Ichter <CIchter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Jill Connors <JConnors@IchterDavis.com>; Carey Miller <carey.miller@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; Jonathan Crumly <jcrumly@taylorenghish.com>; Marilyn Marks <Marilyn@USCGG.org>

Subject: Re: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Bryan,

Our experts worked with the Cobb County files you provided by ftp on Friday. It appears that close to 450,000 images are still missing from production. The details are summarized below. Please let us know whether the images can be provided by either the Secretary's Office or Cobb County. Given the requirement under Election Rule 183-1-12-.13 that a copy of all images must be deposited with the clerk of superior court, we assume that your client and Cobb County officials have determined that the clerk of the court does not possess these copies. Please confirm whether the clerk received a copy of the images.

Please let us know right away whether Cobb's ballot images can be produced as required, and summarized below.

Cobb initial count (Official count for all but POTUS)

No ballot images have been provided. We received the following quantities of images:

Election Day: Zero of an expected 71117 per the election database received from the Secretary of State.

Advanced: Zero of an expected 174979

Absentee: Zero of an expected 149911

Provisional: Zero of an expected 544

The number of original count images we are short and seeking is 396551, a number that corresponds with all the Ballots Cast from the Election Night Report on Clarity.

Cobb machine recount (POTUS)

A partial set of ballot images have been provided as follows.

Election Day: 63284 of an expected 64139 per the election database received from the Secretary of State

Advanced: 174968 of an expected 188650

Absentee: 113989 of an expected 150875

Provisional: 542 (all of these were received)

We have 360603 images from Cobb and expect as many as 412368 representing the machine recount according to the election database received from the Secretary of State.

It is possible some of the images will be found in folders named NotCastImages.

The following counts are of images remaining to be provided from Cobb for the recount tabulation:

The values in parentheses represent all the batches and images expected from the tabulator per the election database received from the Secretary of State.

List of missing images:

Tabulator 1892 batches 10,11,12

Tabulator 1893 batches 17,18,19

Tabulator 4001 batches 74 to 85 inclusive

Tabulator 4002 batches 74 to 80 inclusive

Tabulator 4003 batches 9 to 14 inclusive

Tabulator 4004 batches 72 to 78 inclusive

Tabulator 4006 batches 44 to 48 inclusive

Tabulator 4007 batches 53 to 56 inclusive

Tabulator 1840 batches 140 and 141

Tabulator 1850 batches 314 to 386 inclusive and 466

Tabulator 1863 - all of the 626 batches, (19306 images)

Tabulator 1864 batch 396

Tabulator 1865 all of the 573 batches, (16643 images)

The number of recount images we are short and are seeking is 50,051.

Thanks,

Bruce

From: Bryan Tyson <btyson@taylorenghish.com>

Date: Wednesday, October 6, 2021 at 2:31 PM

To: Robert McGuire <ram@lawram.com>

Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, "vrusso@robbinsfirm.com" <vrusso@robbinsfirm.com>, Bruce Brown <bbrown@brucepbrownlaw.com>, Cary Ichter <CIchter@IchterDavis.com>, "Cross, David D." <DCross@mofo.com>, "Adam M. Sparks" <sparks@khlawfirm.com>, "Conaway, Jenna B." <JConaway@mofo.com>, Jill Connors <JConnors@IchterDavis.com>, Carey Miller <carey.miller@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, Jonathan Crumly <jcrumly@taylorenghish.com>, Coalition for Good Governance <Marilyn@USCGG.org>

Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

As I understand it, these are recount images. We'll send FTP and can arrange external media as well.

Thanks,

Bryan

Bryan P. Tyson

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

<image004.jpg>

[Website](#) | [vCard](#) | [LinkedIn](#) | [Twitter](#)

Ask Me About Our TED Tenet of the Week: Set and Ask for Expectations.

Click [here](#) to learn more about our TED Tenets.

[Georgia Legal Awards Litigation Department of the Year](#)

California | Florida | Georgia | Illinois | Michigan | New York | North Carolina | Pennsylvania | Tennessee
| Texas | Washington

This communication (together with attachments) may contain privileged or confidential information, and its sender reserves and asserts all rights that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of information on periods unless otherwise expressly stated.

From: Robert McGuire <ram@lawram.com>

Sent: Wednesday, October 6, 2021 1:05 PM

To: Bryan Tyson <btyson@taylorenghish.com>

Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucebrownlaw.com>; Cary Ichter <CIchter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Jill Connors <JConnors@IchterDavis.com>; Carey Miller <carey.miller@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; Jonathan Crumly <jcrumly@taylorenghish.com>; Marilyn Marks <Marilyn@USCGG.org>

Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Bryan, thanks.

What images are represented in what you are sending, original count or the recount?

Also, we would appreciate receiving these both by ftp and external media to Jill Connors in Cary's office.

Thank you.

Best,
Robert McGuire

ROBERT A. MCGUIRE, III

*** NOTE NEW CONTACT DETAILS BELOW ***

SHAREHOLDER | THE ROBERT MCGUIRE LAW FIRM

1624 MARKET ST STE 226 #86685, DENVER, CO 80202-2523 | 113 CHERRY ST #86685, SEATTLE, WA 98104-2205

E: ram@lawram.com | T/F: 720.420.1395 | T/F: 253.267.8530 | www.lawram.com

This communication is confidential, may be privileged and is meant only for the intended recipient. If you are not the intended recipient, please notify the sender by reply and delete the message from your system. Any unauthorized dissemination, distribution or copying hereof is prohibited.

From: Bryan Tyson <btyson@taylorenghish.com>

Sent: Wednesday, October 6, 2021 7:46 AM

To: Robert McGuire <ram@lawram.com>

Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucebrownlaw.com>; Cary Ichter <Clichter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Jill Connors <JConnors@IchterDavis.com>; Carey Miller <carey.miller@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; Jonathan Crumly <jcrumly@taylorenghish.com>

Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Robert,

At our request after receiving this additional information from Cobb County, the Secretary's office searched again and was able to locate additional USB drives received from Cobb County that contained ballot images. Those drives contain a total of 324,886 additional ballot images. These images were not in the election project files but were stored separately on USB drives. The SOS staff is in the process of downloading those images into a format we can send to you and we will produce them as soon as we receive them from the Secretary's office.

I have removed Ms. Marks from this response.

Thanks,

Bryan

Bryan P. Tyson

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

<image004.jpg> [Website](#) | [vCard](#) | [LinkedIn](#) | [Twitter](#)

Ask Me About Our TED Tenet of the Week: Set and Ask for Expectations.

Click [here](#) to learn more about our TED Tenets.

[Georgia Legal Awards Litigation Department of the Year](#)

California | Florida | Georgia | Illinois | Michigan | New York | North Carolina | Pennsylvania | Tennessee
| Texas | Washington

This communication (together with all attachments) may contain privileged or confidential information, and its sender reserves and asserts all rights that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please notify the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this email does not constitute advice on the application of material on periods unless otherwise expressly stated.

From: Robert McGuire <ram@lawram.com>

Sent: Tuesday, October 5, 2021 1:35 PM

To: Bryan Tyson <btyson@taylorenglish.com>

Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucebrownlaw.com>; Cary Ichter <CIchter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Marilyn Marks <Marilyn@USCGG.org>; Jill Connors <JConnors@IchterDavis.com>

Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Bryan,

Coalition Plaintiffs have requested the November ballot images, but we have received only 71,000 recount images, which means that nearly 400,000 images are missing from the original count and over 300,000 are missing from the recount.

Daniel White's email below states that **all** ballot images were delivered to the SOS.

Based on your mail of September 17, we assume that your client does not presently have possession of the images or copies. Please let us know the status of this request for Cobb's images in the possession of the Secretary's office. We need to promptly obtain a definitive answer on whether the images were preserved.

Thank you.

Best,
Robert McGuire

ROBERT A. MCGUIRE, III

*** NOTE NEW CONTACT DETAILS BELOW ***

SHAREHOLDER | THE ROBERT MCGUIRE LAW FIRM

1624 MARKET STREET 226 #86685, DENVER, CO 80202-2523 | 113 CHERRY STREET #86685, SEATTLE, WA 98104-2205

E: ram@lawram.com | T/F: 720.420.1395 | T/F: 253.267.8530 | www.lawram.com

This communication is confidential, may be privileged and is meant only for the intended recipient. If you are not the intended recipient, please notify the sender by reply and delete the message from your system. Any unauthorized dissemination, distribution or copying hereof is prohibited.

From: Daniel White <dwhite@hlw-law.com>
Sent: Tuesday, October 5, 2021 7:22 AM
To: Jill Connors <JConnors@IchterDavis.com>
Cc: Bryan Tyson <btyson@taylorenghish.com>; Robert McGuire <ram@lawram.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucebrownlaw.com>; Cary Ichter <CIchter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Marilyn Marks <Marilyn@USCGG.org>
Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Jill, after the November 2020 election and recount the Cobb County Elections Department turned all ballot images over to the Secretary of State's Office, and did not retain any of those images in its own records. Even though my client did not have those images in its possession, after receiving your subpoena Cobb inquired with the Secretary of State about retrieving copies in a good faith effort to comply with the subpoena. The images on the drives are only what was given to us by the Secretary of State.

Daniel W. White
Haynie, Litchfield & White, PC
222 Washington Ave.
Marietta, Georgia 30060
770-422-8901 (direct dial)

From: Jill Connors
Sent: Thursday, September 30, 2021 12:35 PM
To: Daniel White <dwhite@hlw-law.com>
Cc: Bryan Tyson <btyson@taylorenghish.com>; Rob McGuire <ram@lawram.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucebrownlaw.com>; Cary Ichter <CIchter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>; Marilyn Marks <Marilyn@USCGG.org>
Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Good Afternoon, Daniel,

I am writing to follow up on my email below. Can you please update me as to the status of this?

Thank you.

Jill Connors, JD - Paralegal
Ichter Davis LLC

This e-mail message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that you may not read, copy, distribute or otherwise use this message or its attachments. If you have received this message in error, please notify the sender by email and delete all copies of the message immediately.

From: Jill Connors

Sent: Friday, September 24, 2021 1:08 PM

To: Daniel White <dwhite@hlw-law.com>

Cc: Bryan Tyson <btyson@taylorenghish.com>; Rob McGuire <ram@lawram.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucepbrownlaw.com>; Cary Ichter <CIchter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>

Subject: Re: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Daniel,

I hope this email finds you well. I am writing to follow up on the production of Cobb ballot images. After reviewing the USB drives and links provided, we found that (1) they did not include images of the original count, and (2) they included only 71,000 images from the recount, while over 400,000 recount images were anticipated. Accordingly, we request that the full inventory of ballot images for the two counts be promptly provided, or confirmation that no other images were preserved.

Please let me know if you have any questions.

Thank you.

Jill Connors, JD - Paralegal
Ichter Davis LLC

This e-mail message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that you may not read, copy, distribute or otherwise use this message or its attachments. If you have received this message in error, please notify the sender by email and delete all copies of the message immediately.

From: Jill Connors <JConnors@IchterDavis.com>

Sent: Friday, September 17, 2021 2:03 PM

To: Bryan Tyson <btyson@taylorenghish.com>; Robert McGuire <ram@lawram.com>

Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucepbrownlaw.com>; Cary Ichter <CIchter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>

Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Much appreciated.

Jill Connors, JD - Paralegal
Ichter Davis LLC

This e-mail message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that you may not read, copy, distribute or otherwise use this message or its attachments. If you have received this message in error, please notify the sender by email and delete all copies of the message immediately.

From: Bryan Tyson <btyson@taylorenghish.com>
Sent: Friday, September 17, 2021 4:20 PM
To: Jill Connors <JConnors@IchterDavis.com>; Robert McGuire <ram@lawram.com>
Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucepbrownlaw.com>; Cary Ichter <CIchter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>
Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Jill,

What I sent you is what I received from the Secretary's office. I'll check with them and see, but am not sure if they would receive both sets of images from November or not. I'll let you know what I find out.

Thanks,

Bryan

Bryan P. Tyson

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

<image004.jpg> [Website](#) | [vCard](#) | [LinkedIn](#) | [Twitter](#)

Ask Me About Our TED Tenet of the Week: Listen to Understand.

Click [here](#) to learn more about our TED Tenets.

[Georgia Legal Awards Litigation Department of the Year](#)

California | Florida | Georgia | Illinois | Michigan | New York | North Carolina | Pennsylvania | Tennessee
| Texas | Washington

This communication (together with attachments) may contain privileged or confidential information, and its sender reserves and asserts a right that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of information periods unless otherwise expressly stated.

From: Jill Connors <JConnors@IchterDavis.com>
Sent: Friday, September 17, 2021 3:59 PM
To: Bryan Tyson <btyson@taylorenghish.com>; Robert McGuire <ram@lawram.com>
Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown

<bbrown@brucepbrownlaw.com>; Cary Ichter <Clichter@IchterDavis.com>; Cross, David D. <DCross@mofo.com>; Adam M. Sparks <sparks@khlawfirm.com>; Conaway, Jenna B. <JConaway@mofo.com>

Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Good Afternoon, Bryan:

Our team has taken an initial look at the files included in the link you sent yesterday. Unless we failed to complete the entire upload (there was a significant amount of data which can cause errors in the upload), it appears that only the recount files were included in the link as opposed to all images from the November original count and the machine recount. Please advise as to whether we are mistaken; and if not, how we can obtain the full inventory of Cobb County ballot images for the November election.

Thank you for your time and attention to this matter.

**Jill Connors, JD - Paralegal
Ichter Davis LLC**

This e-mail message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that you may not read, copy, distribute or otherwise use this message or its attachments. If you have received this message in error, please notify the sender by email and delete all copies of the message immediately.

From: Bryan Tyson <btyson@taylorenghish.com>

Sent: Thursday, September 16, 2021 2:47 PM

To: Robert McGuire <ram@lawram.com>

Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucepbrownlaw.com>; Cary Ichter <Clichter@IchterDavis.com>; Jill Connors <JConnors@IchterDavis.com>

Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Rob and Jill,

The ballot images have been uploaded to this link:

<https://taylorenghishduma.sharefile.com/i/9f905bc6f448598>

Let us know if you have any trouble accessing them.

Thanks,

Bryan

Bryan P. Tyson

Taylor English Duma LLP | 1600 Parkwood Circle, Suite 200, Atlanta, GA 30339

P: 678.336.7249 | M: 404.219.3160 | btyson@taylorenghish.com

[Website](#) | [vCard](#) | [LinkedIn](#) | [Twitter](#)

<image004.jpg>

Ask Me About Our TED Tenet of the Week: Make Every Interaction Count.

Click [here](#) to learn more about our TED Tenets. Click [here](#) to give feedback on how I am with regard to our TED Tenets.

[Georgia Legal Awards Litigation Department of the Year](#)

California | Florida | Georgia | Illinois | Michigan | New York | North Carolina | Pennsylvania | Tennessee
| Texas | Washington

This communication (together with all attachments) may contain privileged or confidential information, and its sender reserves and asserts all rights that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of information on periods unless otherwise expressly stated.

From: Robert McGuire <ram@lawram.com>

Sent: Thursday, September 16, 2021 12:34 PM

To: Bryan Tyson <btyson@taylorenghish.com>

Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucepbrownlaw.com>; Cary Ichter <Clichter@ichterdavis.com>; Jill Connors <JConnors@ichterdavis.com>; Marilyn Marks <Marilyn@uscgg.org>

Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Thanks, Bryan. Please send the images to Jill Connors, copied.

Best,
Rob

ROBERT A. MCGUIRE, III

*** NOTE NEW CONTACT DETAILS BELOW ***

SHAREHOLDER | THE ROBERT MCGUIRE LAW FIRM

1624 MARKET STREET 226 #86685, DENVER, CO 80202-2523 | 113 CHERRY STREET #86685, SEATTLE, WA 98104-2205

E: ram@lawram.com | T/F: 720.420.1395 | T/F: 253.267.8530 | www.lawram.com

This communication is confidential, may be privileged and is meant only for the intended recipient. If you are not the intended recipient, please notify the sender by reply and delete the message from your system. Any unauthorized dissemination, distribution or copying hereof is prohibited.

From: Bryan Tyson <btyson@taylorenghish.com>

Sent: Wednesday, September 15, 2021 1:55 PM

To: Robert McGuire <ram@lawram.com>

Cc: Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; vrusso@robbinsfirm.com; Bruce Brown <bbrown@brucepbrownlaw.com>; Cary Ichter <Clichter@ichterdavis.com>; Jill Connors <JConnors@ichterdavis.com>; Marilyn Marks <Marilyn@uscgg.org>

Subject: Re: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Robert,

We have discussed this with the Secretary's office and Cobb County did not include their ballot images with their Election Project files, but sent them under separate cover. A group from Cobb County Elections picked up a copy of their ballot images this afternoon and we can likely get a copy of those images tomorrow to send to you.

Thanks,

Bryan

Bryan P. Tyson

Taylor English Duma LLP | [1600 Parkwood Circle, Suite 200, Atlanta, GA 30339](#)

P: [678.336.7249](#) | M: 404.219.3160 | btyson@taylorenghish.com

www.taylorenghish.com

This communication (together with all attachments) may contain privileged or confidential information, and its sender reserves and asserts all rights that may apply to it. If you are not the intended recipient or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate or otherwise use the information. Also, please indicate to the sender that you have received this communication in error and delete the copy you received. If you have not executed an engagement letter with this firm, we do not represent you as your attorney and no duties are intended or created by this communication. Most legal rights have time limits, and this e-mail does not constitute advice on the application of limitation periods unless otherwise so expressly stated.

On Sep 15, 2021, at 12:55 PM, Robert McGuire <ram@lawram.com> wrote:

Bryan,

Please see the highlighting below in an email from Cobb County regarding our subpoena for election project files, specifically the ballot images. Daniel White tells us these images have been sent to the State.

Can you please check with the Secretary's folks and arrange for the Cobb ballot image files either to be sent to Jill Connors (copied), or else put on an FTP download site with a link where we can

download them?

Thank you.

Best,
Robert McGuire

ROBERT A. MCGUIRE, III
DETAILS BELOW ***

***** NOTE NEW CONTACT**

SHAREHOLDER | THE ROBERT MCGUIRE LAW FIRM

1624 MARKET ST STE 226 #86685, DENVER, CO 80202-2523 | 113 CHERRY ST #86685,
SEATTLE, WA 98104-2205

E: ram@lawram.com | T/F: 720.420.1395 | T/F: 253.267.8530 | www.lawram.com

This communication is confidential, may be privileged and is meant only for the intended recipient. If you are not the intended recipient, please notify the sender by reply and delete the message from your system. Any unauthorized dissemination, distribution or copying hereof is prohibited.

From: Daniel White <dwhite@hlw-law.com>

Sent: Wednesday, September 15, 2021 7:57 AM

To: Jill Connors <JConnors@lchterDavis.com>

Cc: Cary Ichter <Clichter@lchterDavis.com>; Bruce Brown

<bbrown@brucepbrownlaw.com>; Robert McGuire <ram@lawram.com>; Gregg

Litchfield <gel@hlw-law.com>; Eveler, Janine <Janine.Eveler@cobbcounty.org>

Subject: RE: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Jill,

As I mentioned yesterday, the attorney in the Cobb County Attorney's office who was monitoring this case, Elizabeth Monyak, is out on FMLA leave. Because of her absence and my familiarity with this case, the County has asked me to assist you with this request.

Janine Eveler forwarded your email and subpoena earlier this week and have been coordinating with her regarding what documents Cobb BoE has in its possession. After talking with her about the requested items, it appears that we do have copies of the Election Project files that we can provide on a flash drive, I just need a day or two to review them, mark them confidential, and add Bates numbering. We do not currently have possession of any ballot images from the election, and any ballot images from the recount were submitted directly to the Secretary of State on the original flash drives. The county does intend to retrieve copies of those images at some point in the near future, but at the present time those documents are not in the county's possession.

Per our conversation this morning, I will agree to accept service of the subpoena on behalf of Janine if Plaintiffs are willing to give us until Friday to provide you with the flash drive containing the marked and Bates stamped-documents.

Additionally, if/when Cobb BoE obtains any of the ballot images you've requested, we will agree to send copies to you if the state has not already done so (provided there is no protective order or agreement excluding them).

Please reply at your earliest convenience and confirm our extension of time to respond to the subpoena.

Daniel W. White
Haynie, Litchfield & White, PC
222 Washington Ave.
Marietta, Georgia 30060
770-422-8901 (direct dial)

From:
Sent: Friday, September 10, 2021 1:10 PM
To: Monyak, Elizabeth <Elizabeth.Monyak@cobbcounty.org>
Cc:
Subject: Curling v. Raffensperger - Issuance of Subpoena to Cobb County

Good afternoon, Ms. Monyak,

As you may recall, Cary Ichter, along with Bruce Brown, represents the Coalition Plaintiffs in Curling v. Raffensperger, currently pending in the United States District Court for the Northern District of Georgia. On Cary's behalf, I have attached a pdf of a subpoena to Cobb County for documents – specifically, "Election Project files, including all ballot images, for the November 3, 2020 election and the recount."

We would like to avoid the trouble and expense of personally serving this subpoena and also work out the logistics for the actual production of the documents. Will you accept service of the subpoena?

Thank you and I look forward to hearing from you.

And – Cary says "Hi!"

Jill Connors, JD - Paralegal
Ichter Davis LLC
3340 Peachtree Road NE
Suite 1530
Atlanta, GA 30326
Phone: 404.869.7600
Fax: 404.869.7610
jconnors@ichterdavis.com

This e-mail message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that you may not read, copy, distribute or otherwise use this message or its attachments. If you have received this message in error, please notify the sender by email and delete all copies of the message immediately.

CAUTION: This email originated outside Cobb County Government. Please exercise caution when opening links/attachments in this email .